

GIBSON, DUNN & CRUTCHER LLP
Orin Snyder (*pro hac vice*)
osnyder@gibsondunn.com
200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035

Rosemarie T. Ring (SBN 220769)
rring@gibsondunn.com
Kristin A. Linsley (SBN 154148)
klinsley@gibsondunn.com
Martie Kutscher (SBN 302650)
mkutscherclark@gibsondunn.com
555 Mission Street, Suite 3000
San Francisco, CA 94105-0921
Telephone: 415.393.8200
Facsimile: 415.393.8306

Attorneys for Defendant Facebook, Inc.,

GIBSON, DUNN & CRUTCHER LLP
Deborah Stein (SBN 224570)
dstein@gibsondunn.com
Heather Richardson
hrichardson@gibsondunn.com
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: 213.229.7000
Facsimile: 213.229.7520

Joshua S. Lipshutz (SBN 242557)
jlipshutz@gibsondunn.com
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Telephone: 202.955.8500
Facsimile: 202.467.0539

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**[PROPOSED] ORDER GRANTING
FACEBOOK, INC.'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
CERTAIN MATERIALS IN SUPPORT OF
FACEBOOK, INC., GIBSON, DUNN &
CRUTCHER LLP, AND ORIN SNYDER'S
SUPPLEMENTAL BRIEF IN
OPPOSITION TO PLAINTIFFS'
MOTION FOR SANCTIONS**

[PROPOSED] ORDER

The Court has considered Facebook, Inc.'s Administrative Motion to File Under Seal Certain Materials in Support of Facebook, Inc., Gibson, Dunn & Crutcher LLP, and Orin Snyder's Supplemental Brief in Opposition to Plaintiffs' Motion for Sanctions, which proposes to redact limited portions of the following documents:

Document	Description of Portions Sought to Be Kept Under Seal
Facebook, Inc., Gibson, Dunn & Crutcher LLP, and Orin Snyder's Supplemental Brief in Opposition to Plaintiffs' Motion for Sanctions	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Br. at i, 2, 20–24.
Declaration of Heather L. Richardson in Support of Facebook, Inc., Gibson, Dunn & Crutcher LLP, and Orin Snyder's Supplemental Brief in Opposition to Plaintiffs' Motion for Sanctions	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Decl. at ¶¶ 6–11.
Exhibit 53	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 53 at 1–2, 4–5, 7–11. Limited portions that reveal confidential information regarding ADI; the Court previously found good cause to seal similar information. Ex. 53 at 1–2, 4–5.
Exhibit 56	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 56 at 95:2–8, 10–11, 19, 21–22, 24; 96:5, 7, 19, 22, 24; 97:1, 22–23; 104:4–8, 12; 185:1–7, 9–10, 12–14, 16, 18, 22–24; 198:6, 10, 15. Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. <i>Id.</i>
Exhibit 61	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding ADI; the Court previously found good cause to seal similar information. Ex. 61 at 2.
Exhibit 63	<ul style="list-style-type: none"> Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 63 at 3–4.
Exhibit 64	<ul style="list-style-type: none"> Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 64 at 2–4.

[PROPOSED] ORDER

Case No. 3:18-MD-02843-VC

Exhibit 66	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 66 at 1–5.
Exhibit 68	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 68 at 1.
Exhibit 69	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 69 at 19:15, 20:2.
Exhibit 70	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 70 at 2–7.
Exhibit 73	<ul style="list-style-type: none"> Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 73 at 1–4. Limited portions that reveal confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. Ex. 73 at 2–3.
Exhibit 82	<ul style="list-style-type: none"> Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 82 at 269:2–6.

Good cause having been shown, Facebook, Inc.'s Administrative Motion to File Under Seal Certain Materials in Support of Facebook, Inc., Gibson, Dunn & Crutcher LLP, and Orin Snyder's Supplemental Brief in Opposition to Plaintiffs' Motion for Sanctions is GRANTED. The Court hereby ORDERS:

1. The redacted versions of the following documents shall be filed on the public docket:
 - A. Facebook's Exhibits 53, 56, 61, 63, 64, 66, 68–70, 73, 82.
2. The unredacted versions of the following documents shall be sealed permanently:
 - A. Facebook's Exhibits 53, 56, 61, 63, 64, 66, 68–70, 73, 82.

IT IS SO ORDERED.

DATE: _____

VINCE CHHABRIA
United States District Judge